

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF ILLINOIS
EAST ST. LOUIS DIVISION**

STEPHANIE HERRINGTON,)
Administrator of the Estate of)
JASON STRAHAN, Deceased,) No. 3:20-cv-938-NJR
)
Plaintiff,)
)
v.)
)
JEREMY BRADFORD, *et al.*,)
)
Defendants.)

**NOTICE OF SETTLEMENT
AND MOTION TO STAY ALL DEADLINES**

Plaintiff and all defendants hereby jointly notify the Court this matter has settled entirely and hereby request the Court stay all pending deadlines. In support thereof:

1. Plaintiff and all defendants have reached an agreement to settle this matter in its entirety.
2. The settlement has been approved by an Illinois probate court in an order dated May 23, 2024 in the proceeding captioned as *Estate of Jason Strahan*, No. 19-P-115 (7th Jud. Cir., Macoupin Cnty., Ill.).
3. The parties require additional time to effectuate settlement, including the issuance of payment on behalf of all defendants.
4. The parties request the Court stay all pending deadlines.
5. The parties further request the Court set a deadline, at least 60 days out, for the parties to file a Stipulation of Dismissal pursuant to Federal Rule of Civil Procedure 41.

By: s/ Todd W. Sivia

Todd Sivia
Paul Marks
Sivia Law
217 S. Main St
Edwardsville, IL 62025
Phone: 618-659-4499
Email: tws@sivialaw.com
pmarks@sivialaw.com
Attorneys for plaintiff

By: s/ Joseph D. Bracey, Jr. (with consent)

Joseph D. Bracey, Jr.
Michael Victor
IFMK Law, Ltd.
650 Dundee Road, Suite 475
Northbrook, IL 60062
Phone: 847-291-0200
Email: jbracey@ifmklaw.com
mvictor@ifmklaw.com
Attorneys for defendants City of Staunton and Jeremy Bradford

By: s/ Charles Pierce (with consent)

Charles A. Pierce
Pierce Law Firm, P.C.
#3 Executive Woods Ct, Suite 200
Belleville, IL 62226
Phone: 618-277-5599
Email: cpierce@piercelawpc.com
Attorney for defendant Molly Margaritis

By: s/ Jennifer Powell (with consent)

Jennifer Powell
Illinois Attorney General's Office - Belleville
201 West Pointe Dr, Suite 7
Belleville, IL 62226
Phone: 618-236-8786
Email: jennifer.powell@ilag.gov
Attorney for defendant Kevin Billings

By: s/ Heidi Eckert (with consent)

Heidi Eckert
Blitz, Bardgett et al.
120 South Central, Suite 1500
St. Louis, MO 63105
Phone: 314-863-1877
Email: heckert@bbdlc.com
Attorney for defendants Brianna Markel, Madison County Sheriff's Department, and John Lakin

CERTIFICATE OF SERVICE

I hereby certify that on May 30, 2024, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will serve all counsel of record.

s/ Todd W. Sivia